



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-6900

FAX (503) 229-6945

TTY 711

October 6, 2015

Ken Novak
MMGL Corporation
3200 NW Yeon Ave.
Portland, OR 97210

RE: Basis of Design Report – Groundwater Source Control measure
Premier Edible Oils Site, ECSI #2013

Dear Mr. Novak:

The Oregon Department of Environmental Quality (DEQ) has reviewed in parallel the *Revised Basis of Design Report - Groundwater Source Control Measure*, dated September 2015, and *Responses to DEQ/USEPA Comments on Basis Design Report*, dated September 24, 2015, submitted by ERM on behalf of MMGL Corp. for the Premier Edible Oil (PEO) site. The PEO site is located at 10400 N. Burgard Way in Portland, Oregon. Comments from DEQ and United States Environmental Protection Agency (USEPA) on the “pre-final” design report (ERM, July 2015) were provided in letters dated August 28, 2015. The design documents serve to satisfy the scope of work identified in the Voluntary Cleanup Agreement (ECDVC-NWR-01-06) dated March 6, 2001, including source control measures (SCMs). Historical petroleum releases resulted in the presence of LNAPL in soil and groundwater, while also inducing geochemical conditions that mobilized naturally-occurring metals, primarily arsenic and manganese, into groundwater. In 2014, DEQ issued a recommended alternative for LNAPL and groundwater source control at the PEO site in which USEPA provided comment.

Consistent with DEQ’s recommendation, MMGL is proposing a groundwater barrier wall (GWBW) in conjunction with oxygenation to prevent the migration of LNAPL and mitigate unacceptable levels of dissolved petroleum and metals migrating in groundwater to the Willamette River. Design plans for an accompanying oxygenation system will be presented under separate submittals. In addition, MMGL will develop a performance monitoring plan to assess whether the groundwater SCM, as-built, is effective in achieving remedial action objectives (RAOs) for source control.

DEQ appreciates the information presented in MMGL’s response to DEQ/USEPA comments on the pre-final design report. However, DEQ prefers that this information be incorporated into one complete final design report. With respect to project schedule, the details provided in the response comments in conjunction with the revised design report are sufficient for DEQ to concur with plans for construction of the GBWW.

DEQ also has the following general comments on the Revised Basis Design Report.

General Comments

1. Thank you for providing a communication plan. Please, specify who should be contacted when there is a need to make field corrections and/or stop work if we observe activities not conducted as agreed. Also, schedule regular onsite meetings with DEQ during construction of the SCM, commencing with site preparation.
2. Thank you for the additional construction detail including the probable "Contractor" and technique. Additional information should be communicated to DEQ as it becomes available (directly, weekly reporting, onsite meetings) and documented in the construction completion report (CCR).
3. As requested, DEQ/USEPA was provided a *Summary of Groundwater Model Construction for Barrier Wall* via email on September 21, 2015. While DEQ does not concur with certain assumptions used in the model, groundwater travel time is still relatively long (compared to rates of TPH biodegradation and manganese oxidation). Therefore construction of the biobarrier (GWBW with oxygenation) should achieve RAOs over time.
4. A comprehensive performance monitoring plan is forthcoming, from MMGL, which DEQ and USEPA have provided preliminary expectations. DEQ advises MMGL to install the monitoring wells and begin monitoring as soon as feasible to establish baseline (pre-remediation) conditions and initiate monitoring of remedy progress. DEQ does not anticipate lateral movement of LNAPL around the barrier wall but supports installing additional monitoring wells to verify conditions.

An updated Revised Basis Design Report is not required; however, as noted above construction details should be communicated to DEQ and well documented. DEQ will continue to work with PEO to determine the appropriate measures to achieve protectiveness and whether concentrations are reduced in a reasonable timeframe.

Please feel free to contact me at (503)229-6900 to discuss the project.

Sincerely,



Erin K. McDonnell, P.E.
Project Manager
Northwest Region Cleanup Program

cc: Kevin Parrett, DEQ
Matt McClincy, DEQ
Henning Larsen, DEQ
Eva DeMaria, USEPA
Tom Graf, GrafCon
Brendan Robinson, ERM-West
Erik Ipsen, ERM-West